

1 Joseph R. Saveri
2 Steven N. Williams
3 JOSEPH SAVERI LAW FIRM, INC.
4 601 California Street, Suite 1000
5 San Francisco, California 94108
6 Phone: (415) 500-6800
7 Fax: (415) 395-9940
8 jsaveri@saverilawfirm.com
9 swilliams@saverilawfirm.com

10 COHEN & GRESSER LLP
11 Melissa H. Maxman (*Pro Hac Vice* to be submitted)
12 Erica C. Lai (SBN 261787)
13 2001 Pennsylvania Ave, NW, Suite 300
14 Washington, DC 20006
15 Phone: (202) 851-2070
16 Fax: (202) 851-2081
17 mmaxman@cohengresser.com
elai@cohengresser.com

18 ANDREW J. McGUINNESS, ESQ.
19 Andrew J. McGuinness (*Pro Hac Vice* to be submitted)
20 122 S Main St., Suite 118
P.O. Box 7711
21 Ann Arbor, MI 48107
Phone: (734) 274-9374
Fax: (734) 786-9935
drewmcg@topclasslaw.com

22 *Counsel for Intervenor Plaintiffs*
DOUGLAS KING and GEORGE FELDMAN

23
24 **UNITED STATES DISTRICT COURT**
25
NORTHERN DISTRICT OF CALIFORNIA

26 IN RE CATHODE RAY TUBE (CRT)
27 ANTITRUST LITIGATION

28 MDL No. 1917

Case No. 07-cv-5944 JST

THIS DOCUMENT RELATES TO ALL
INDIRECT PURCHASER ACTIONS

**DECLARATION OF JOSEPH R. SAVERI
IN SUPPORT OF INTERVENOR
PLAINTIFFS' NOTICE OF MOTION AND
MOTION TO INTERVENE**

Hearing Date: February 28, 2019
Time: 2:00 p.m.
Courtroom: 9, 19th Floor
Judge: Honorable Jon S. Tigar

MDL No. 1917
Case No. 07-cv-5944 JST

JUDGE: HONORABLE JON S. TIGAR

1 I, Joseph R. Saveri, declare and state as follows:

2 1. I am the founder of the Joseph Saveri Law Firm, Inc. (“JSLF”), and I am a member in good
3 standing of the State Bar of California. I am over 18 years of age and have personal knowledge of the
4 facts stated in this Declaration. If called as a witness, I could and would testify competently to them. I
5 make this declaration pursuant to 28 U.S.C. § 1746

6 2. I make this Declaration in support of Intervenor Plaintiffs’ Notice of Motion and Motion to
7 Intervene in the Indirect Purchaser Plaintiffs (“IPP”) Actions.

8 3. JSLF has investigated, prosecuted, and successfully resolved numerous antitrust class actions
9 such as this one. Some of these cases include *In re Capacitors Antitrust Litig.*, MDL No. 1917, 3:14-cv-
10 03264-JD (N.D. Cal.), *In re Titanium Dioxide Antitrust Litig.*, RDB-10-0318 (D. Md.), *In re High-Tech
11 Employee Antitrust Litig.*, 11-cv-2509-LHK (N.D. Cal.) , and *In re Cipro Cases I & II*, (San Diego Cty.
12 Super. Ct. Nos. JCCP 4154/4220. As lead or co-lead counsel in these cases, I have taken a personal
13 leadership role in organizing the litigation, setting strategy, establishing and directing teams of lawyers
14 and assigning specific tasks to teams of attorneys in a way that ensures the efficient use of resources and
15 maximizes the talents of the litigation team. I have negotiated numerous settlements in complex cases,
16 including antitrust cases and other class actions.

17 4. Over the past decade, my partner Steven N. Williams has played a lead role in many prominent
18 antitrust class cases. These include *In re Automotive Parts Antitrust Litig.*, MDL No. 2311 (E.D. Mich)
19 (largest ever recovery in an indirect purchaser class action) and *Wortman v. All Nippon Airways*, 854
20 F.3d 606 (9th Cir., 2017) and *E. & J. Gallo Winery v. WD Energy*, 503 F.3d 1027 (9th Cir. 2007) two
21 groundbreaking cases which expanded the power of federal courts to consider damage claims in
22 antitrust cases involving regulated industries.

23 5. JSLF has been widely acknowledged for excellence in the field of complex litigation, including
24 antitrust cases. The firm and its lawyers have received awards and accolades from numerous
25 organizations and entities, including the American Antitrust Institute, Chambers USA, Martindale
26 Hubbell, and *Super Lawyers*. They lecture and write on many topics, are actively involved in numerous
27 legal organizations, are multi-lingual and from diverse backgrounds, and are active in various *pro bono*
28 activities. Additional information on the firm can be found at <https://saverilawfirm.com>.

6. Attached hereto as Exhibit A is a true and correct copy of a photograph of the label affixed to a television set purchased by Intervenor Plaintiff George Feldman in Anne Arbor, Michigan. Mr. Feldman has not opted-out of the certified IPP class.

7. Attached hereto as Exhibit B is a true and correct copy of a photograph of the label affixed to a television set purchased by Intervenor Plaintiff Douglas King in Anne Arbor, Michigan. Mr. King has not opted out of the certified IPP class.

I declare under penalty of perjury that the foregoing is true and correct, and this Declaration is executed at San Francisco, California on January 11, 2019.

By: /s/ Joseph R. Saveri
Joseph R. Saveri

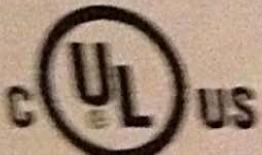
Exhibit A

Thomson multimedia Inc.
10330 NORTH MERIDIAN STREET
INDIANAPOLIS, IN 46290-1024

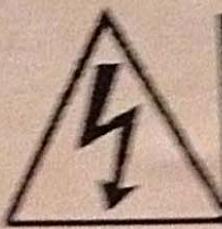
GE

Thomson multimedia Ltd
6200 Edwards Blvd.
MISSISSAUGA, ONT. L4T

LISTED TV
RECEIVER/RECEPTEUR



336H E7916



WARNING/AVERTISSEMENT

RISK OF ELECTRIC SHOCK. DO NOT OPEN
RISQUE DE CHOC ELECTRIQUE NE PAS OUVRIR

COMPLIES WITH FDA RADIATION PERFORMANCE STANDARDS 21 CFR SUBCHAPTER J. THIS DEVICE COMPLIES WITH PART 15 OF THE FCC RULES. OPERATION IS SUBJECT TO THE CONDITION THAT THIS DEVICE DOES NOT CAUSE HARMFUL INTERFERENCE. CABLE COMPATIBLE TELEVISION APPARATUS, CANADA. CONFORME A LA NORME FEDERALE SUR LA PERFORMANCE EN RAYONNEMENT DE LA FDA EN MATIERE DE RAYONNEMENT. CET APPAREIL EST CONFORME A L'ALINEA 15 DU REGLEMENT DE LA FCC. IL NE PEUT ETRE UTILISE QUE LA CONDITION DE NE PAS PROVOQUER D'INTERFERENCE GENEANTE. TELEVEISSEUR CABLECOMPATIBLE, CANADA.

ASSEMBLED IN / ASSEMBLÉ EN /

MEXICO
120 VOLTS
60 Hz
125 WATTS MA

MANUFACTURED/FABRIQUE

AUGUST /
AOUT
2002



BA166C335B3060

SERVICE NO. / NO. DE SERVICE

27G12777Y51

MODEL / MODELE

27GT277

SERIAL NO. / NO. DE SERIE

C335B3060

CHASSIS NO. / NO. DE CHASSIS

CTC203AF9

Exhibit B

THOMSON CONSUMER ELECTRONICS, INC.
10330 NORTH MERIDIAN STREET
INDIANAPOLIS, IN 46290-1024

LISTED TV RECEIVER/RECEPTEUR


336H E7916

COMPLIES WITH FDA RADIATION PERFORMANCE
STANDARDS 21 CFR SUBCHAPTER J.
STEREO SETS LICENSED BY TELESONICS SYSTEMS
UNDER CAN. PATS. 1120582 AND 1145032.
CABLE COMPATIBLE TELEVISION APPARATUS,
CANADA GRR PART II

AUGUST /
AOUT 1995

SERVICE NO./No. de SERVICE

F19201BKTX2

MODEL/MODELE

F19201BK

MANUFACTURED/FABRIQUE



80000533443176

PRINTED IN USA

SERIAL NO./No. de SERIE

533443176

RCA

THOMSON CONSUMER ELECTRONICS CANADA
THOMSON ELECTRONIQUE GRANDE
PUBLIC du CANADA, INC.
PRESCOTT, ONTARIO

WARNING

RISK OF ELECTRIC SHOCK
DO NOT OPEN



AVERTISSEMENT
RISQUE DE CHOC ELECTRIQUE
NE PAS OUVrir

CONFORME A CFR, SOUS-ALINEA J, DES NORMES
DE LA FDA EN MATIERE DE RAYONNEMENT
CASQUE STEREO SOUSSE LICENCE DE TELESONICS
BREVETS CANADIENS 1120582 ET 1145032.

TELEVISOR CABLOCOMPATIBLE RGR. PARTIE II, CANADA
ASSEMBLED IN/MONTE

JUAREZ
CHIH., MEXICO

VOLTS: 120 WATTS (MAX)
Hz: 60

CHASSIS NO./No. de CHASSIS
CTC175C2
2054030318
85